

Burak S. Ahmed, Esq.
Nevada Bar No: 12547
MANATT, PHELPS & PHILLIPS, LLP
2049 Century Park East
Suite 1700
Los Angeles, California 90067
Telephone: 310.312.4000
Facsimile: 310.312.4224
Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JENNIFER WOODBURN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE GENERAL AUTOMOBILE
INSURANCE SERVICES, INC., doing
business as THE GENERAL, a California
corporation,

Defendant.

Case No. 2:22-cv-01975-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), LR 7-1, LR IA 6-1, and LR IA 6-2, Plaintiff Jennifer Woodburn ("Plaintiff") and Defendant The General Automobile Insurance Services, Inc., doing business as The General ("Defendant"), by and through undersigned counsel, respectfully stipulate and agree and jointly move the Court for an Order extending the deadline for Defendant to respond to Plaintiff's Complaint (ECF No. 1, "Complaint") in this matter, to and including February 3, 2023. In support thereof, Plaintiff and Defendant further state and agree as follows:

1. Plaintiff filed her Complaint in this matter on November 28, 2022.
2. Defendant was served with process on December 14, 2022. By operation of Fed. R. Civ. P. 12(a)(1)(A)(i), therefore, the Defendant's response to the Complaint is presently due on January 4, 2023.
3. Counsel for the parties met and conferred on January 4, 2023, by telephone,

1 regarding extending the foregoing deadline. Plaintiff agreed to grant Defendant an extension of not
 2 less than thirty (30) days. By operation of Fed. R. Civ. P. 6(a)(1) & (5), therefore, Defendant's new
 3 deadline to file its response to the Complaint, if approved by the Court, would be on February 3,
 4 2023.

5 4. The purpose of the requested extension is to allow Defendant's counsel, who were
 6 just recently retained, adequate time to fully investigate the allegations set forth in the Complaint
 7 and to permit the parties to explore a possible extra-judicial resolution of their differences this
 8 matter, which may obviate the Defendant's response deadline.

9 5. This is the parties' first request for an extension of this deadline. It is not made for
 10 purposes of delay, and would not prejudice any party.

11 6. By this requested extension, Defendant is not waiving any objections or defenses to
 12 the Complaint available under applicable law, and the parties have agreed to be bound by its terms
 13 pending the Court's approval and entry of same.

14 WHEREFORE, for all of the reasons above, the parties stipulate and respectfully request
 15 that the Court enter this order extending the Defendant's deadline to respond to the Complaint by
 16 a period of no less than thirty (30) days, to and including February 3, 2023, along with granting all
 17 other relief the Court deems just and proper.

18 Dated: January 4, 2023

Dated: January 4, 2023

19 MANATT, PHELPS & PHILLIPS, LLP

JEFFREY A. COGAN CHARTERED, a PLLC

20 By: /s/ Burak S. Ahmed
 21 Burak S. Ahmed, Esq. (NBN: 12547)
 22 2049 Century Park East
 23 Suite 1700
 Los Angeles, California 90067
 Attorneys for Defendant

By: /s/ Jeffrey A. Cogan (w/ Permission)
 Jeffrey A. Cogan, Esq. (NBN: 4569)
 1057 Whitney Ranch Drive, Suite 350
 Henderson, Nevada 89014
 Attorneys for Plaintiff

24 IT IS SO ORDERED:

25 
 26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 1/5/2023
 28

1
2 Respectfully Submitted by:

3 MANATT, PHELPS & PHILLIPS, LLP

4 /s/ Burak S. Ahmed

5 Burak S. Ahmed, Esq. (NBN: 12547)

6 2049 Century Park East

7 Suite 1700

Los Angeles, California 90067

Attorneys for Defendant

8 **CERTIFICATE OF SERVICE**

9 The undersigned hereby certifies that the foregoing document was electronically filed and
10 served on all counsel of record in the above-captioned matter on Wednesday, January 04, 2023, via
11 the Court's CM/ECF filing service.

12 /s/ Burak S. Ahmed

13 Burak S. Ahmed